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February 22, 2016

By ECF

Honorable Roanne L Mann
United States Magistrate Judge
Eastern District of New York
225 Cadman Plaza East
Brooklyn, New York 11201

Re: Ruffin, et ano v. City of New York, et al.,
Davis v. City of New York, et al.

Your Honor:

I am an Senior Corporation Counsel in the office of Zachary W. Carter, Corporation Counsel of The City of New York, representing the defendant The City of New York in these action. I am writing to request a one day extension of time to respond to plaintiffs' letter regarding discovery disputes, from today, February 22, 2017 until tomorrow, February 23, 2017.

As Your Honor is aware, plaintiff submitted a letter on Friday, February 13, 2017 detailing certain discovery disputes among the parties. Yesterday, on Tuesday, February 21, 2017, Your Honor Ordered defendant to respond to that letter by today, as well as submitting certain documents to plaintiffs' counsel. Under the Local Rules, parties typically are given three business days to respond to motions regarding discovery disputes. As Monday was a holiday, I had planned to have a response to the Court by Thursday. Since receipt of the Court's Order yesterday, I have been attempting to complete my response and have it reviewed by my office under this slightly expedited schedule. Despite these attempts, and due to the absence of my supervisor, I have been unable to prepare a response. I am therefore requesting an extension of a single day in order to respond to plaintiffs' letter and the Court's Order

Accordingly, we respectfully request that the City's time to respond to the plaintiffs' letter be extended until February 23, 2017. I thank you for your attention to this matter.

Respectfully submitted,

Honorable Judge Mann
Ruffin, et al v. NYC, et al.
February 22, 2017
Page 2

/s

Elissa B. Jacobs

cc: David Thompson
Attorney for Plaintiff

By ECF